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May 6, 2020

Via ECF
The Honorable Richard M. Berman, U.S.D.J.
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *Fisher v. SD Protection Inc. et al*
            Case No. 1:17-cv-2229-RMB-KNF

Dear Judge Berman:

We are counsel to Plaintiff in the above-captioned matter. Pursuant to the Court's Order dated April 7, 2020 (Docket No. 107), we prepared a revised settlement agreement and sent same to Defendants' counsel. Counsel responded that he would provide same to his client. However, thereafter, on April 29, 2020, counsel informed us that his client said that since she cannot comply with the agreement financially, she cannot sign a new agreement.

As Plaintiff would still like to effectuate the $25,000 settlement reached before Your Honor during the settlement conference, and as counsel is willing to accept a lower fee than it had originally requested (pursuant to the Court's guidance, as previously submitted), we respectfully request the Court approve the formerly filed Settlement Agreement as fair and reasonable, subject to the modifications later proposed by the Court and accepted by the Plaintiff as to allocation of the settlement sum.

Alternatively, Plaintiff proposes the Court schedule a teleconference[1] to discuss: (i) Defendants' counsel's request to withdraw, and (ii) a schedule for resuming the litigation, including setting dates for dispositive motions and trial.

We thank Your Honor for considering this matter.

Respectfully,

/s/ Anne Seelig
Anne Seelig, Esq.

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[1] In the event the Court schedules an in-person conference, we remind the Court that Defendants' counsel is located in Florida and consent to their telephonic appearance